# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BELDEN CANADA ULC,	)	
Plaintiff,	)	
v.	)	
	)	C.A. No. 22-782-RGA
COMMSCOPE, INC., COMMSCOPE, INC.	)	
OF NORTH CAROLINA, and COMMSCOPE	)	
TECHNOLOGIES, LLC,	)	
	)	
Defendants.	)	

## **JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Paragraph 7 of the Scheduling Order (D.I. 31), Plaintiff Belden Canada ULC ("Plaintiff") and Defendants CommScope, Inc., CommScope Inc. of North Carolina, and CommScope Technologies, LLC (collectively, "Defendants") hereby submit this Joint Claim Construction Chart for the disputed terms/phrases in U.S. Patent No. 6,409,547 (the "'547 Patent").

The terms/phrases and constructions are set forth below, along with an identification of supporting intrinsic evidence and the parties' nonargumentative explanations of why resolution of the dispute makes a difference. The parties expressly reserve the right to rely upon evidence cited by one another. The parties reserve the right to amend their constructions, and to rely on additional intrinsic or extrinsic evidence as the claim construction process proceeds.

#### I. Claim Terms Not in Dispute and Stipulated Constructions

Claim Term	Claims	Stipulated Construction
"wherein said spring contacts number 1 and 3		Spring contacts number 1 and 3 [or 4 and 6] are electrically connected to
[or 4 and 6] are capacitively coupled by a first arrangement of said capacitive coupling	Claims 18, 19	two of the capacitive coupling elements, which are capacitively coupled to each other ( <i>i.e.</i> , form a capacitor), and spring contacts number

elements, and wherein said	3 and 5 [or 6 and 8] are electrically
spring contacts number 3	connected to two of the capacitive
and 5 [or 6 and 8] are	coupling elements, which are
capacitively coupled by a	capacitively coupled to each other
second arrangement of	(i.e., form a capacitor)
capacitive coupling	
elements"	

# II. <u>Claim Terms in Dispute that Parties Agree Should be Addressed at Claim Construction Hearing</u>

Attached as Joint Exhibit A is a chart identifying: (1) the disputed terms/phrases; (2) each party's proposed construction of the disputed claim language; and (3) citation(s) to the intrinsic evidence in support of the parties' respective proposed constructions. *See* D.I. 31 at ¶ 7. Additionally, a text searchable .PDF copy of the '547 Patent and associated Certificate of Correction dated June 25, 2002 are attached as Joint Exhibit B (BCU\_REEDE000001-30). *Id*. Copies of the portions of the intrinsic evidence relied upon by the parties are attached hereto as follows:

Joint Exhibit	Document Description
C.	'547 Patent Prosecution History, Office Action dated 10/18/2000
	(BCU_REEDE000101-109)
D.	'547 Patent Prosecution History, Office Action Amendment and Response
	dated 4/18/2001 (BCU_REEDE000122-135)
E.	'547 Patent Prosecution History, Office Action dated 5/22/2001
	(BCU_REEDE000137-145)
F.	'547 Patent Prosecution History, Office Action Amendment and Response
	dated 8/22/2001 (BCU_REEDE000146-151)

Defendants' Exhibit	Document Description
1.	'547 Patent Prosecution History, Application dated 12/2/1999 (BCU REEDE000035-81)
2.	'547 Patent Prosecution History, Notice of Allowability (BCU_REEDE000153-155)
3.	Provisional Patent Application No. 60/110,595 (COMMJACK_0001805-36)

4.	U.S. Application Ser. No. 09/276,004 (COMMJACK_0001873-908)
5.	U.S. Application Sr. No. 60/106,140 (COMMJACK_0001909-23)
6.	U.S. Application Ser. No. 60/117,525 (COMMJACK_0001924-44)
7.	U.S. Application Ser. No. 09/286,113 (COMMJACK_0001837-72)
8.	Martin (U.S. Patent No. 5,967,801) (COMMJACK_0001635-42)
9.	Merchant (U.S. Patent No. 6,106,335) (COMMJACK_0001701-09)
10.	Geurts (U.S. Patent No. 5,967,828) (COMMJACK_0001643-48)
11.	Bohbot (U.S. Patent No. 5,326,284) (COMMJACK_0001569-79)

Dated: November 20, 2023

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